APPENDIX B

IMPLEMENTATION PLAN

BLACK-TAILED PRAIRIE DOG CONSERVATION AND MANAGEMENT

ALTERNATIVE 1

Summary Description: Prairie Dog Conservation Concurrent with Population Regulation and Management through Non-Lethal Methods and Limited Rodenticide Use

Conservation. Current LRMP direction for prairie dog conservation is unchanged and implemented as funding, staffing and priorities allow. Conservation activities underway include but are not limited to:

- Expansion of the prairie dog colony complex in the Conata Basin black-footed ferret reintroduction area (Management Area 3.63),
- Prairie dog shooting closure in Conata Basin black-footed ferret reintroduction habitat,
- Identification and implementation of opportunities for landownership adjustment to facilitate prairie dog population expansion while reducing boundary management conflicts,
- Expansion of the prairie dog colony complex (Management Area 3.63) near Smithwick, South Dakota, as potential habitat for future black-footed ferret reintroductions,
- Establishment and maintenance of designated prairie dog colony complexes (conservation focus areas) on the Fort Pierre and Oglala National Grasslands,
- Live-trapping and relocation of prairie dogs for black-footed ferret recovery program and for accelerating prairie dog colony expansion in selected areas.

In addition to the conservation activities just listed, prairie dog shooting closures identified in the LRMP for ferret reintroduction habitat would be implemented in the Smithwick ferret habitat area (Management Area 3.63) in 2005.

The colony complexes mentioned above, one each on the Fort Pierre and Oglala National Grasslands, need to meet design criteria specified in the LRMP to help ensure long-term persistence of prairie dog populations on those areas. The complex criteria are a minimum of 1,000 acres in at least 10 colonies located no greater than 6 miles apart (inter-colony distance). These criteria closely follow recommendations presented in the Multi-State Conservation Plan for the Black-tailed Prairie Dog (Luce 1999 and 2003).

Boundary Management. LRMP direction to manage prairie dog populations using non-lethal management tools (and limited use of rodenticide) is implemented as appropriate and where it would be most effective over the long-term.

- Non-lethal methods such as vegetation management through livestock grazing modifications are implemented in selected sites to help regulate and manage prairie dog populations. Non-lethal methods are used along property boundaries to reduce colony establishment and expansion rates in these areas. For example, this may include the use of temporary vegetation management fencing to help manage livestock grazing, including livestock removal, to create visual barriers along property boundaries. Fencing would be determined on a case-by-case basis, taking into consideration factors such as the rate of prairie dog expansion, soils, precipitation trends, and vegetative species composition. Areas where vegetation management fencing is used would also provide additional forage, especially during low precipitation periods (drought), for prairie dogs in an attempt to help reduce prairie dog dispersal to other lands. If suitable destination sites are available, live-trapping may be used in a few selected colonies along boundaries to remove and relocate prairie dogs. Identification and evaluation of opportunities for landownership adjustment to reduce prairie dog management conflicts with adjoining landowners continues as prescribed in the LRMP.
- Limited use of rodenticide is prescribed and implemented for public health and safety risks and damage to facilities, such as rural residences. Although it has never been confirmed in the project area, a plague epizootic near a rural residence would certainly be considered a health and safety risk. The abundance of rattlesnakes in prairie dog colonies is considered a health and safety issue when colonies expand into and around farm and ranch headquarters and rural residences. Recreational prairie dog shooting near farm and ranch headquarters is also a safety issue. All decisions regarding rodenticide use, including the amount and extent of rodenticide use, on the national grasslands in response to public health and safety risks would be made by the Forest Service after on-site evaluations.
- Review and implement as appropriate the conservation measures common to all alternatives identified below (Section 2.2.5 of the FEIS):

  1) Inventory and monitor black-tailed prairie dogs and black-footed ferrets as prescribed in Chapter 4 of the LRMP.

  2) Avoid all significant fossil and heritage resource sites when conducting any ground-disturbing projects. Before ground disturbing activities, a Forest Service paleontologist and archeologist would be contacted to review the proposed project to determine if any fossil or heritage resource surveys, reports, or actions are needed.

  3) Prior to ground disturbing activities, a journey-level Forest Service biologist/botanist would be contacted to review the proposed project to determine if any biological surveys, reports, or actions are needed.

  4) If the predicted range of prairie dog colony acreage listed in Table 3-2 of this document for any national grassland is exceeded, prairie dog management would be revisited. This may involve additional public involvement and environmental analysis.

5) If whooping cranes are sighted in an area where rodenticide is being applied, operations will be stopped until the cranes leave the area or are hazed out of the area. In addition, if rodenticide has been applied to an area where cranes have been seen, the area will be watched and any cranes that come near the rodenticide will be hazed until they leave the treated colony to ensure no birds are exposed to treated grain.
6) The U.S. Fish and Wildlife Service will be consulted prior to use of rodenticide or shooting in a national grassland colony in the Conata Basin ferret area that is near private or tribal land and within a mile of black-footed ferret habitat on Badlands National Park.
7) Before any on-the-ground management activities (i.e., fencing) occur, review any species at risk timing limitation direction in the LRMP.

Project-Level Implementation. There is no additional public disclosure or site-specific analysis requirements if the management tools identified above are applied within the criteria presented in the following table. Project-level implementation of these tools outside the criteria may require additional public disclosure and site-specific evaluation.

TABLE
Project-Level Implementation Criteria for Alternative 1

MANAGEMENT TOOL (AREA)	*NEPA/NFMA COMPLIANCE*	*ESA COMPLIANCE*	*NHPA/PALEO COMPLIANCE*
Rodenticide			
All NFS Lands	Compliant if colony is presenting a public health or safety risk, causing damage to a facility, and 2% zinc phosphide grain bait is applied between 10/1 and 12/31	Compliant, additional consultation not required if outside Conata Basin ferret habitat	Not required
Conata Basin Ferret Habitat	See criteria above for "All NFS Lands"	Compliant if colony is unoccupied by ferrets. If occupied consult with FWS. Requires additional ESA consultation if within a mile of ferret habitat on Badlands National Park	Not required
Smithwick Ferret Habitat	See criteria above for "All NFS Lands"	Compliant, additional consultation not required prior to FWS issuing a proposed rule for reintroduction	Not required
Vegetation Management Through Livestock Grazing Coordination (includes temporary fencing to help create visual vegetation barriers)			
All NFS Lands	Compliant if adjustments are made through annual operating plans	Compliant, additional consultation not required	Requires additional review if significant soil disturbance would occur
Live-trapping			
Ferret Habitat	Compliant if under state and/or federal permits	Compliant, additional consultation not required	Not required
Landownership Adjustment			
All NFS Lands	Requires additional environmental analysis and public disclosure	Requires additional ESA consultation	Requires additional review

IMPLEMENTATION PLAN

BLACK-TAILED PRAIRIE DOG CONSERVATION AND MANAGEMENT

ALTERNATIVE 2

Summary Description: Prairie Dog Conservation Concurrent with Population Regulation and Management through Non-Lethal Methods and Expanded Rodenticide Use Along Property Boundaries (1.0 Mile Boundary Management Zone).

Conservation. Some of the LRMP direction for prairie dog conservation continues to be implemented as funding, staffing and priorities allow. This direction includes but is not limited to:

- Maintain the prairie dog colony complex in the Conata Basin black-footed ferret reintroduction area (Management Area 3.63),
- Modified prairie dog shooting closure in Conata Basin black-footed ferret reintroduction habitat,
- Identification and implementation of opportunities for landownership adjustment to facilitate prairie dog population expansion.

The LRMP also prescribes development of black-footed ferret reintroduction habitat on the Buffalo Gap National Grassland near Smithwick, South Dakota. However, successful establishment of a prairie dog colony complex under this alternative that is large enough to support a ferret reintroduction in this area would likely require conservation agreements for additional active colony acreage on adjoining lands.

Boundary Management. LRMP direction to manage prairie dog populations using non-lethal management tools is implemented as appropriate and where it would be most effective over the long-term. Rodenticide is added under this alternative as a primary tool for use on prairie dog colonies that encroach onto adjoining agricultural lands. Encroachment occurs when a prairie dog colony on national grasslands expands to a point where unwanted colonization of adjoining land occurs and is unwanted by the landowner and/or manager. This definition is taken from the South Dakota Black-tailed Prairie Dog Conservation and Management Plan.

- Non-lethal tools under this alternative also include landownership adjustment, financial incentives and conservation easements. On-site evaluations of complaint areas identifying opportunities for landownership adjustment with willing landowners in problematic complaint areas would be a high priority, especially in black-footed ferret habitat. As prescribed in the LRMP, progress in initiating and completing landownership adjustments with willing landowners to facilitate prairie dog conservation and management would be reported in the annual LRMP Monitoring and Evaluation Report. Financial incentives and conservation easements would involve government agencies and private organizations working with willing landowners to find ways of conserving prairie dogs on their lands and national grasslands.

- Non-lethal methods would be used concurrently, where appropriate, with rodenticide along property boundaries to augment long-term effectiveness of the rodenticide. For example, this may include the use of temporary vegetation management fencing to help manage livestock grazing, including livestock removal, in boundary management zones to create visual barriers. Fencing would be determined on a case-by-case basis, taking into consideration factors such as the rate of prairie dog expansion, soils, precipitation trends, and vegetative species composition. Areas where vegetation management fencing is used will also provide additional forage, especially during low precipitation periods (drought), for prairie dogs in an attempt to help reduce prairie dog dispersal to other lands. If more long-term adjustments are needed in livestock grazing management to facilitate the effectiveness of prairie dog management, additional environmental analyses and public disclosure would be conducted as appropriate. Use of physical prairie dog barriers or live-trapping and relocation of prairie dogs may also be used in a few selected areas.
- Non-lethal tools may be applied along boundaries with private inholdings (private lands surrounded by federal lands), small isolated tracts, especially in black-footed ferret reintroduction habitat.
- Regulated shooting in the Conata Basin black-footed ferret habitat may be authorized in selected colonies in the boundary management zone if minimum ferret population thresholds continue to be met and the authorized level of incidental take, as specified in a Biological Opinion by the U.S. Fish and Wildlife Service for the Conata Basin black-footed ferret reintroduction is not likely to be exceeded. This would require a modification to the current Forest Service shooting closure. The intent is to help reduce prairie dog populations along boundaries to reduce unwanted colonization of adjoining lands. Regulated shooting involves, but is not limited to, specifying the number of shooters, acceptable ammunition, and season and shooting hours in selected colonies. It also includes the necessary enforcement and oversight by the Forest Service. The Forest Service shooting closure is retained for the interior portions of Conata Basin ferret habitat. Recreational prairie dog shooting outside occupied black-footed ferret reintroduction habitat continues under State regulatory authorities and helps reduce prairie dog populations in both interior and boundary colonies on national grasslands.
- The Forest Service shooting closure prescribed in the LRMP for black-footed ferret habitat applies equally to the Smithwick ferret habitat on Buffalo Gap National Grassland. However, a Forest Service shooting closure would not be implemented in this area until progress is made in initiating a cooperative ferret reintroduction plan. Forest Service defers decisions on prairie dog shooting restrictions on national grasslands outside active black-footed ferret reintroduction habitat to the states.
- Rodenticide use could extend a maximum of one mile into national grasslands from private or tribal property boundaries. This does not apply to boundaries along state school lands, Badlands National Park and other federal lands. All rodenticide use on the national grasslands would be in response to valid

complaints from adjoining landowners that can demonstrate colonization on their lands along property boundaries and encroachment from a national grassland colony. On the Buffalo Gap and Fort Pierre National Grasslands, the complaint process is initiated through the State of South Dakota. The appropriate response to each complaint involving a national grassland colony would be determined by the Forest Service after on-site evaluations and coordination with landowners and South Dakota Departments of Agriculture and Game, Fish and Parks. In Nebraska, on-site evaluations would likely be conducted with landowners and officials from the Game and Parks Commission and USDA Animal and Plant Health Inspection Service.

Decisions not to use rodenticide in response to some complaints may occur where encroachment is not evident or for a variety of other site-specific reasons.

- Rodenticide may also be used in response to public health and safety risks and damage to facilities. This could occur along property boundaries or within interior areas of national grasslands and forests.
- Additional criteria apply on some areas before rodenticide use would be authorized. Rodenticide use in the Conata Basin black-footed ferret reintroduction area could only extend to a mile if minimum black-footed ferret population thresholds continue to be met. These thresholds, based on current information, indicate that between 12,500 and 19,000 acres of active prairie dog colonies are needed, depending on prairie dog densities, to support a long-term ferret population (Livieri and Perry 2005). If the minimum thresholds are not being met, rodenticide use would not occur or would be limited to less than a mile from adjoining lands. The black-footed ferret minimum threshold for Conata Basin is maintaining a 200 ferret family rating on Federal lands capable of supporting at least 100 breeding adults, which will be monitored annually during the summer prior to any control work.

Prairie dog rodenticide along property boundaries is not proposed under this action on the Bessey Ranger District (including the Samuel R. McKelvie National Forest) and the National Forest portion of the Pine Ridge Ranger District. Only non-lethal tools would be considered to address adjoining landowner complaints about encroachment on these areas. These areas currently do not support prairie dog colonies, but if colonies establish in the future along property boundaries, only non-lethal methods would be considered to help address adjoining landowner complaints. Any proposed use of rodenticide in these areas would require additional environmental analysis and public disclosure.

Project-Level Implementation. The full suite of wildlife damage management tools identified above would be applied under a prairie dog management plan. The successful application of these tools is highly dependent on effective and timely monitoring of prairie dog colony distributions and dynamics. In the Conata Basin ferret reintroduction habitat, monitoring of prairie dog densities and ferret populations and survival is also critically important for the prairie dog adaptive management plan to be effective. The prairie dog management tools are:

- Financial incentives, conservation agreements, or landownership adjustments are the initial tools of choice to resolve prairie dog problems in complaint areas along the following emphasis boundary areas: 1) inholdings in MA 3.63; 2) lands adjoining MA 3.63 with chronic unwanted colonization; 3) inholdings in the Oglala and Fort Pierre prairie dog colony complex areas; and 4) lands adjoining the colony complex prairie dog colonies. These solutions may involve other government agencies or private organizations that facilitate financial incentives or compensation, conservation agreements or conservation easements with willing landowners.
- If the initial tools of choice do not present a viable and timely solution for a boundary complaint area, rodenticide and vegetation management are then considered primary and applied as appropriate. Rodenticide use should be considered concurrent with a vegetation management evaluation and if appropriate, modifications in livestock grazing strategies.
- Live-trapping to remove prairie dogs for the black-footed ferret recovery program, or relocation to a more desirable location is a secondary tool for consideration in the Conata Basin ferret habitat. Because of the expense and difficulty in finding suitable prairie dog relocation sites, use of live-trapping is expected to be very limited.
- Regulated shooting is another secondary tool to consider in selected colonies along the boundaries of the Conata Basin ferret reintroduction area.
- Visual or physical barriers have considerable non-lethal appeal but only have limited effectiveness and would be utilized primarily in reoccurring complaint areas.
- During low precipitation periods (drought), implement light livestock grazing intensities and/or other grazing modifications in complaint areas as appropriate. During severe or extended droughts, remove livestock from the national grasslands in complaint areas to help reduce successful prairie dog dispersal and colony expansion and establishment. However, it needs to be recognized that the effects of these drought contingencies on the population recovery rate in recently poisoned colonies within complaint areas are difficult to accurately predict. Repeat rodenticide applications may be needed to prevent eventual population recovery in recently poisoned colonies.
- Review and implement as appropriate the conservation measures common to all alternatives identified below (Section 2.2.5 of the FEIS):

    1) Inventory and monitor black-tailed prairie dogs and black-footed ferrets as prescribed in Chapter 4 of the LRMP.

    2) Avoid all significant fossil and heritage resource sites when conducting any ground-disturbing projects. Before ground disturbing activities, a Forest Service paleontologist and archeologist would be contacted to review the proposed project to determine if any fossil or heritage resource surveys, reports, or actions are needed.

3) Prior to ground disturbing activities, a journey-level Forest Service biologist/botanist would be contacted to review the proposed project to determine if any biological surveys, reports, or actions are needed.

4) If the predicted range of prairie dog colony acreage listed in Table 3-2 of this document for any national grassland is exceeded, prairie dog management would be revisited. This may involve additional public involvement and environmental analysis.

5) If whooping cranes are sighted in an area where rodenticide is being applied, operations will be stopped until the cranes leave the area or are hazed out of the area. In addition, if rodenticide has been applied to an area where cranes have been seen, the area will be watched and any cranes that come near the rodenticide will be hazed until they leave the treated colony to ensure no birds are exposed to treated grain.

6) The U.S. Fish and Wildlife Service will be consulted prior to use of rodenticide or shooting in a national grassland colony in the Conata Basin ferret area that is near private or tribal land and within a mile of black-footed ferret habitat on Badlands National Park.

7) Before any on-the-ground management activities (i.e., fencing) occur, review any species at risk timing limitation direction in the LRMP.

There is no additional public disclosure or site-specific analysis requirements if the management tools identified above are applied within the criteria presented in the following table. Project-level implementation of these tools outside the criteria may require additional public disclosure and site-specific evaluation.

TABLE
Project-Level Implementation Criteria for Alternative 2

MANAGEMENT TOOL (AREA)	*NEPA/NFMA COMPLIANCE*	*ESA COMPLIANCE*	*NHPA/PALEO COMPLIANCE*
Rodenticide			
All NFS Lands	Compliant if colony is presenting a public health or safety risk, causing damage to a facility, and 2% zinc phosphide grain bait is applied between 10/1 and 1/31 Compliant if colony is within designated boundary management zones; encroaching or would likely encroach on adjoining lands in the near future; and 2% zinc phosphide grain bait is applied between 10/1 and 1/31	Compliant, additional consultation not required if outside Conata Basin ferret habitat and NEPA compliant	Not required
Conata Basin Ferret Habitat	See criteria above for "All NFS Lands"	Compliant if monitoring indicates that the ferret family rating of 200 is maintained or exceeded Compliant if colony is unoccupied by ferrets. If occupied, consult with FWS. Requires additional ESA consultation if within a mile of ferret habitat on Badlands National Park	Not required
Smithwick Ferret Habitat	See criteria above for "All NFS Lands"	No additional consultation needed prior to FWS issuing a proposed rule for reintroduction	Not required
Shooting			
Conata Basin Ferret Habitat	Compliant if in boundary management zones	Compliant if in boundary management zones Requires additional ESA consultation if within a mile of ferret habitat on Badlands National Park	Not required
Smithwick Ferret Habitat	Compliant	Compliant	Not required
All Other NFS Lands	Not required (defer to states)	Not required	Not required

MANAGEMENT TOOL (AREA)	*NEPA/NFMA COMPLIANCE*	*ESA COMPLIANCE*	*NHPA/PALEO COMPLIANCE*
Vegetation Management Through Livestock Grazing Coordination (includes temporary fencing to help create visual vegetation barriers)			
All NFS Lands	Compliant if adjustments are made through annual operating plans	Compliant, additional consultation not required	Requires additional review if significant soil disturbance would occur
Other Visual/Physical Barriers			
All NFS Lands	May require additional environmental analysis and public disclosure if significant soil disturbance would occur	Compliant, additional consultation not required	Requires additional review if significant soil disturbance would occur
Live-trapping			
All NFS Lands	Compliant if under state and/or federal permit	Compliant if under state and/or federal permit	Not required
Financial Incentives/Conservation Easements			
All NFS Lands	This would be between other agencies, organizations and willing landowners. Therefore, there are no NEPA/NFMA regulatory requirements for FS.	Not required	Not required
Landownership Adjustment			
All NFS Lands	Requires additional environmental analysis and public disclosure	Requires additional ESA consultation	Requires additional review

IMPLEMENTATION PLAN

BLACK-TAILED PRAIRIE DOG CONSERVATION AND MANAGEMENT

ALTERNATIVE 3

Summary Description: Prairie Dog Conservation Concurrent with Population Regulation and Management through Non-Lethal Methods and Expanded Rodenticide Use along Property Boundaries (0.25 Mile Boundary Management Zone – Fort Pierre National Grassland; and 0.5 Mile Boundary Management Zone – Oglala and Buffalo Gap National Grasslands).

Conservation. Most LRMP direction for prairie dog conservation is implemented as funding, staffing and priorities allow. Modifications are made to some conservation measures prescribed in the LRMP including the shooting and rodenticide prohibitions in black-footed ferret reintroduction habitat (Management Areas 3.63).

Priority conservation activities implemented under this alternative include:

- Expansion of the prairie dog colony complex in the Conata Basin black-footed ferret reintroduction habitat (Management Area 3.63),
- Identification and implementation of opportunities for landownership adjustment to facilitate prairie dog population expansion,
- Modified prairie dog shooting closure in Conata Basin black-footed ferret reintroduction habitat,
- Establishment and intensive management of prairie dog colony complexes on Fort Pierre and Oglala National Grasslands,
- Third party solutions with willing landowners.

The LRMP also prescribes development of black-footed ferret reintroduction habitat on the Buffalo Gap National Grassland near Smithwick, South Dakota. Under this action, successful establishment of a prairie dog colony complex that is large enough to support a ferret reintroduction in this area may take more than 10 years or may require conservation agreements for additional active colony acreage on adjoining lands.

The colony complexes mentioned above, one each on the Fort Pierre and Oglala National Grasslands, need to meet design criteria specified in the LRMP to help ensure long-term persistence of prairie dog populations on those areas. The complex criteria are a minimum of 1,000 acres in at least 10 colonies located no greater than 6 miles apart (inter-colony distance). These criteria closely follow recommendations presented in the Multi-State Conservation Plan for the Black-tailed Prairie Dog (Luce 1999 and 2003).

Boundary Management. LRMP direction to manage prairie dog populations using non-lethal management tools is implemented as appropriate and where it would be most effective over the long-term. Rodenticide use in boundary management zones is added under this alternative as a primary tool for use on prairie dog colonies that encroach onto adjoining agricultural lands. Encroachment is defined as a national grassland colony that extends across a private or tribal property boundary or would likely cross a property

boundary within 1 to 2 years. By stopping colonies just before they encroach on an adjoining landowner, the number of chronic problem areas likely to develop and the amount of rodenticide and other management actions requested and needed in the future should be substantially reduced.

Some questions to consider for determining encroachment of prairie dogs and the need to implement various boundary zone management options:

- To what extent is the prairie dog colony on national grassland contributing to unwanted colonization of the adjoining lands?
- Has the colony on national grassland expanded onto the adjoining lands and are the colonized areas on the national grasslands and adjoining lands contiguous?
- If the colony has not expanded across the property boundary, will it likely do so within the next year or two?
- Is the landowner willing to consider third party solutions to help resolve the complaint?
- Are there opportunities for a possible landownership adjustment for long-term resolution of the complaint?
- Are local range conditions on the national grasslands suitable for vegetation management activities through livestock grazing coordination to assist long-term management of the colony?
- Will (or has) rodenticide use occur on adjacent private or tribal property, and will our (Forest Service) rodenticide use actions be effective?

These on-site evaluation reports through coordination with other entities (including landowners) will be submitted to the respective district ranger for final resolution and retained in the official files at the respective district office. After reviewing each evaluation report, the district ranger will develop a set of actions consistent with this decision for addressing each complaint and additional documentation as to how those actions were carried out. Additional site-specific NEPA will be initiated where analysis suggests that probable action is outside the scope of this decision. The colonies are routinely measured on a 3-year cycle. After each cycle the evaluation will be updated.

Based on site-specific conditions and knowledge, the above questions and associated evaluation reports are used to adapt management actions. These management actions may range from short-term to long-term (i.e. rodenticide use to vegetation management to land adjustments). The initial management actions are prescribed to likely achieve desired conditions in a timely manner. Adaptive management provides forward thinking (i.e. drought issues) and if monitoring shows that desired conditions are not being met, then an alternate set of management actions would be implemented to achieve the desired results.

More detailed information on how prairie dog management tools would be used in boundary management zones follows:

- Non-lethal management tools include landownership adjustment and third party solutions. On-site evaluations of complaint areas identifying opportunities for

landownership adjustment and third party solutions with willing landowners in problematic complaint areas would be a high priority, especially in black-footed ferret habitat and the designated prairie dog colony complexes on the Fort Pierre and Oglala National Grasslands. As prescribed in the LRMP, progress in initiating and completing landownership adjustments with willing landowners to facilitate prairie dog conservation and management would be reported in the annual LRMP Monitoring and Evaluation Report. Third party solutions involve other government agencies or private organizations that provide innovative solutions to help conserve prairie dogs on their lands and national grasslands. These solutions include but are not limited to financial incentives, conservation agreements and easements with willing landowners, and other tools identified in the national black-tailed prairie dog conservation assessment and strategy (Van Pelt 1999).

- Non-lethal methods would also be used concurrently, where appropriate, with rodenticide along property boundaries to augment long-term effectiveness of rodenticides. For example, this may include the use of temporary vegetation management fencing to help manage livestock grazing, including livestock removal, in boundary management zones to create visual (vegetation) barriers. Fencing would be determined on a case-by-case basis, taking into consideration factors such as the rate of prairie dog expansion, soils, precipitation trends, and vegetative species composition. Areas where vegetation management fencing is used would also provide additional forage, especially during low precipitation and drought conditions, for prairie dogs in an attempt to help reduce prairie dog dispersal to other lands. If more long-term adjustments are needed in livestock grazing management to facilitate the effectiveness of prairie dog management, additional environmental analyses and public disclosure may be conducted as appropriate. Use of visual and physical prairie dog barriers may also be used in selected areas.
- Non-lethal tools may be applied along boundaries with private inholdings (private lands surrounded by federal lands), small isolated tracts, especially in black-footed ferret reintroduction habitat and designated prairie dog colony complexes.
- Regulated shooting in the Conata Basin black-footed ferret habitat may be authorized in the boundary management zone if minimum ferret population thresholds continue to be met and the authorized level of incidental take, as specified in a Biological Opinion (April 5, 1994) by the U.S. Fish and Wildlife Service for the Conata Basin black-footed ferret reintroduction, is not likely to be exceeded. This would require a modification to the current Forest Service shooting closure. The intent is to help regulate prairie dog populations along boundaries to reduce unwanted impacts on adjoining lands. Regulated shooting involves, but is not limited to, specifying the number of shooters, type of ammunition, and season and shooting hours for selected colonies. It also includes the necessary enforcement and oversight. The Forest Service shooting closure is retained for the interior portions of Conata Basin ferret habitat. Recreational prairie dog shooting outside occupied black-footed ferret reintroduction habitat continues under State regulatory authorities and helps

regulate prairie dog populations in both interior and boundary colonies on national grasslands. Conata Basin colonies, as with all other colonies, will be monitored on a 3-year cycle as a minimum.

- The Forest Service shooting closure prescribed in the LRMP for black-footed ferret habitat applies equally to the Smithwick ferret habitat on Buffalo Gap National Grassland. However, a Forest Service shooting closure would not be implemented in this area until progress is made in initiating a cooperative ferret reintroduction plan. A Forest Service shooting closure would be implemented if annual increases needed to achieve ferret habitat objectives are not being met. Forest Service defers decisions on prairie dog shooting restrictions on national grasslands outside active black-footed ferret reintroduction habitat to the states. Smithwick colonies, as with all other colonies, will be monitored on a 3-year cycle as a minimum.
- Landownership patterns, forage productivity, and prairie dog distribution are different between the Fort Pierre, Buffalo Gap and Oglala National Grasslands, so guidance on rodenticide use is not consistent across the national grasslands. This is necessary to balance the need for prairie dog conservation with concerns of adjoining landowners. Boundary management zones on the Buffalo Gap and Oglala National Grasslands where rodenticide and other management tools could be used to reduce unwanted colonization of adjoining lands extend a maximum of 0.5 miles from private or tribal property boundaries into the national grasslands. The boundary management zone on the Fort Pierre National Grassland is set at a lesser width of 0.25 miles (maximum) to avoid elimination of most colonies and due to the limited encroachment problems. Boundary management zones are set up only along private or tribal lands and not along state school lands, Badlands National Park or other federal lands.
- Rodenticide use would occur on the national grasslands to prevent encroachment (as defined) in response to valid complaints from adjoining landowners that can demonstrate colonization on their lands along property boundaries or imminent (1 to 2 years) colonization and that a national grassland colony is a significant contributor to the colonization. On the Buffalo Gap and Fort Pierre National Grasslands, the complaint process is initiated through the State of South Dakota. The Forest Service would determine the appropriate response to each complaint involving a national grassland colony after an on-site evaluation.

  Decisions where rodenticide use would not occur or would be limited to less than specified distances may occur in response to: 1) complaints where encroachment is not evident; 2) in accordance with Appendix E Biological Assessment and the USFWS letter of concurrence; or 3) for other site-specific reasons.
- Rodenticide may also be used in response to public health and safety risks and damage to facilities. This could occur along property boundaries or within interior areas of national grasslands and forests.
- Unique circumstances involving chronic colony-specific encroachment problems may warrant exceeding the specified distances, but these rare exceptions would

only be made if additional environmental analyses and public disclosure were conducted. For example:

- Rodenticide use in the Conata Basin black-footed ferret reintroduction area could extend beyond the specified distance if minimum black-footed ferret population thresholds continue to be met. The minimum threshold for Conata Basin is maintaining a 200 ferret family rating on Federal lands capable of supporting at least 100 breeding adults, which will be monitored annually during the summer prior to any control work. These thresholds, based on current information, indicate that between and at a minimum 12,500 and 19,000 acres of active prairie dog colonies are needed, depending on prairie dog densities, to support a long-term ferret population (Livieri and Perry 2005).
- Rodenticide use on Oglala and Fort Pierre National Grasslands (0.5 and 0.25 mile boundary management zones respectively) could only extend beyond the specified distances if reasonable progress can be demonstrated in establishing the prairie dog colony complexes prescribed in the LRMP for both areas. Reasonable progress is achieved when long-term trends in active prairie dog colony acreage remain above the 1996–98 colony acreages used in the LRMP FEIS analyses.

Prairie dog rodenticide along property boundaries is not proposed under this action on the Bessey Ranger District (including the Samuel R. McKelvie National Forest) and the National Forest portion of the Pine Ridge Ranger District. Only non-lethal tools would be considered to address adjoining landowner complaints about encroachment on these areas. These areas currently do not support prairie dog colonies, but if colonies establish in the future along property boundaries, only non-lethal methods would be considered to help address adjoining landowner complaints. Any proposed use of rodenticide in these areas would require additional environmental analysis and public disclosure.

Project-Level Implementation. The full suite of wildlife damage management tools identified above would be applied under an adaptive management plan. The successful application of this plan is highly dependent on effective and timely monitoring of prairie dog colony distributions and dynamics. In the Conata Basin ferret reintroduction habitat, monitoring of prairie dog densities and ferret populations and survival is also critically important for the prairie dog adaptive management plan to be effective. The adaptive management tools are:

- Third party solutions and landownership adjustments are the initial long-term tools of choice to resolve prairie dog problems in complaint areas along the following emphasis boundary areas: 1) inholdings in MA 3.63; 2) lands adjoining MA 3.63 with chronic unwanted colonization; 3) inholdings in the Oglala and Fort Pierre prairie dog colony complex areas; and 4) lands adjoining the colony complex prairie dog colonies. Third party solutions involve other government agencies or private organizations that facilitate financial incentives or compensation, conservation agreements or conservation easements with willing landowners.

- If the initial tools of choice do not present a viable and timely solution for a boundary complaint area, rodenticide and vegetation management are then considered primary and applied as appropriate. Rodenticide use should be considered concurrent with a vegetation management evaluation and if appropriate, modifications in livestock grazing strategies.
- Live-trapping to remove prairie dogs for the black-footed ferret recovery program, or relocation to a more desirable location is a secondary tool for consideration in the Conata Basin ferret habitat and designated prairie dog colony complexes on the Fort Pierre and Oglala National Grasslands. Because of the expense and difficulty in finding suitable prairie dog relocation sites, use of live-trapping is expected to be very limited.
- Regulated shooting is another secondary tool to consider in selected colonies along the boundaries of the Conata Basin ferret reintroduction area.
- Visual or physical barriers have considerable non-lethal appeal but only have limited effectiveness and would be utilized primarily in reoccurring complaint areas.
- During low precipitation periods (drought), implement light livestock grazing intensities and/or other grazing modifications in complaint areas as appropriate. During severe or extended droughts, remove livestock from the national grasslands in complaint areas to help reduce successful prairie dog dispersal and colony expansion and establishment.
- Review and implement as appropriate the conservation measures common to all alternatives identified below (Section 2.2.5 of the FEIS):

  1) Inventory and monitor black-tailed prairie dogs and black-footed ferrets as prescribed in Chapter 4 of the LRMP.

  2) Avoid all significant fossil and heritage resource sites when conducting any ground-disturbing projects. Before ground disturbing activities, a Forest Service paleontologist and archeologist would be contacted to review the proposed project to determine if any fossil or heritage resource surveys, reports, or actions are needed.

  3) Prior to ground disturbing activities, a journey-level Forest Service biologist/botanist would be contacted to review the proposed project to determine if any biological surveys, reports, or actions are needed.

  4) If the predicted range of prairie dog colony acreage listed in Table 3-2 of this document for any national grassland is exceeded, prairie dog management would be revisited. This may involve additional public involvement and environmental analysis.

  5) If whooping cranes are sighted in an area where rodenticide is being applied, operations will be stopped until the cranes leave the area or are hazed out of the area. In addition, if rodenticide has been applied to an area where cranes have been seen, the area will be watched and any cranes that come near the

rodenticide will be hazed until they leave the treated colony to ensure no birds are exposed to treated grain.

6) The U.S. Fish and Wildlife Service will be consulted prior to use of rodenticide or shooting in a national grassland colony in the Conata Basin ferret area that is near private or tribal land and within a mile of black-footed ferret habitat on Badlands National Park.

7) Before any on-the-ground management activities (i.e., fencing) occur, review any species at risk timing limitation direction in the LRMP.

There is no additional public disclosure or site-specific analysis requirements if the management tools identified above are applied within the criteria presented in the following table. Project-level implementation of these tools outside the criteria may require additional public disclosure and site-specific evaluation.

TABLE
Project-Level Implementation Criteria for Alternative 3

MANAGEMENT TOOL (AREA)	*NEPA/NFMA COMPLIANCE*	*ESA COMPLIANCE*	*NHPA/PALEO COMPLIANCE*
Rodenticide			
All NFS Lands	Compliant if colony is presenting a public health or safety risk, causing damage to a facility, and 2% zinc phosphide grain bait is applied between 10/1 and 1/31 Compliant if colony is within designated boundary management zone; encroaching or would likely encroach on adjoining lands in the near future; and 2% zinc phosphide grain bait is applied between 10/1 and 1/31	Compliant if outside Conata Basin ferret habitat and NEPA compliant	Not required
Conata Basin Ferret Habitat	See criteria above for "All NFS Lands"	Compliant if monitoring indicates that the ferret family rating of 200 is maintained or exceeded Compliant if colony is unoccupied by ferrets. If occupied consult with FWS. Requires additional ESA consultation if within a mile of ferret habitat on Badlands National Park	Not required
Smithwick Ferret Habitat	See criteria above for "All NFS Lands"	No additional consultation needed prior to FWS issuing a proposed rule for reintroduction	Not required

MANAGEMENT TOOL (AREA)	*NEPA/NFMA COMPLIANCE*	*ESA COMPLIANCE*	*NHPA/PALEO COMPLIANCE*
Shooting			
Conata Basin Ferret Habitat	Compliant if in boundary management zones and shooting is regulated	Compliant if within designated boundary management zones and regulated Requires additional ESA consultation if within a mile of ferret habitat on Badlands National Park	Not required
Smithwick Ferret Habitat	Not required (defer to states)	Not required Consultation required once ferrets are proposed for release	Not required
All Other NFS Lands	Not required (defer to states)	Not required	Not required
Vegetation Management Through Livestock Grazing Coordination (includes temporary fencing to help create visual vegetation barriers)			
All NFS Lands	Compliant if adjustments are made through annual operating plans	Compliant	Requires additional review if significant soil disturbance would occur
Other Visual/Physical Barriers			
All NFS Lands	Requires additional environmental analysis and public disclosure if significant soil disturbance would occur	Compliant	Requires additional review if significant soil disturbance would occur
Live-trapping			
All NFS Lands	Compliant if under state and/or federal permit	Compliant if under state and/or federal permit	Not required

MANAGEMENT TOOL (AREA)	*NEPA/NFMA COMPLIANCE*	*ESA COMPLIANCE*	*NHPA/PALEO COMPLIANCE*
Financial Incentives/Conservation Agreements/Third Party Solutions			
All NFS Lands	Forest Service could assist but this does not require an agency decision. Therefore, there are no NEPA/NFMA regulatory requirements.	Forest Service could assist but this does not require an agency decision. Therefore, there are no ESA consultation requirements.	Forest Service could assist but this does not require an agency decision. Also, this does not involve any soil disturbing activities. Therefore, there are no additional review requirements.
Landownership Adjustment			
All NFS Lands	Requires additional environmental analysis and public disclosure	Requires additional ESA consultation	Requires additional review